

UNITED STATES DISTRICT COURT
for the
Northern District of California

Oct 30 2020

SUSAN Y. SOONG
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE

United States of America
v.

Kaylin Allyssa Cohoe

Case No. **CR 20-71564-MAG**
20 MJ 1879

Defendant(s)

FILED
United States District Court
Albuquerque, New Mexico
Mitchell R. Elfers
Clerk of Court

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 30, 2020 to present in the county of Santa Clara in the
Northern District of California, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 USC 1073	Unlawful Flight to Avoid Prosecution

This criminal complaint is based on these facts:

See attached affidavit.

Penalties: Maximum 5 years' imprisonment; Maximum \$250,000 fine; up to 3 years' supervised release; \$100 special assessment.

☒ Continued on the attached sheet.

/s/

Approved as to form /s/
AUSA Andrew Liao

Complainant's signature

Colleen Dettling, FBI Special Agent

Printed name and title

Sworn to before me by telephone.

Date: October 30, 2020

City and state: San Jose, California



Judge's signature

Hon. Nathanael Cousins, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT OF FBI SPECIAL AGENT COLLEEN DETTLING
IN SUPPORT OF CRIMINAL COMPLAINT**

I, Colleen Dettling, hereby declare as follows:

1. I submit this affidavit in support of a criminal complaint charging Kaylin Allyssa Cohoe (the “defendant”) with Unlawful Flight to Avoid Prosecution (UFAP) in violation of 18 U.S.C. § 1073. Because this affidavit is submitted for the limited purpose of filing a complaint and obtaining an arrest warrant, I have not included every fact known to me or to investigators concerning the defendant; rather, I have set forth only those facts that I believe are necessary to support the complaint and lawful arrest of the defendant.

2. I am a Special Agent of the Federal Bureau of Investigation (FBI) and have been since July 2009. I am presently assigned to the San Francisco Office of the FBI. As a Federal Agent, I am authorized to investigate violations of laws of the United States and to execute warrants issued under the authority of the United States.

3. My investigative responsibilities include matters involving Violent Crimes Against Children. As part of my duties, I work with and assist both local and state law enforcement agencies with the apprehension of fugitives who take flight to other states or other jurisdictions.

4. While acting in my current capacity, I learned from the Santa Clara County District Attorney’s Office that a complaint was filed in the Superior Court of California, County of Santa Clara, on September 30, 2020 charging the defendant with kidnapping in violation of California Penal Code 207(a) and depriving a lawful custodian of the right to custody or visitation in violation of California Penal Code 278.5(a). I also learned that the Santa Clara Superior Court issued a felony arrest warrant for the defendant and set bail at \$100,000.00.

5. The Santa County District Attorney’s Office has requested the assistance of the FBI in locating and apprehending the defendant, and has informed me that it will extradite the defendant from anywhere domestically.

6. I understand that the defendant has fled from Santa Clara County to New Mexico. On September 8, 2020, the Morgan Hill Police Department contacted the defendant directly via telephone. The defendant answered and stated that she was in the area of Crownpoint, New Mexico. The defendant also confirmed that she had the kidnapping victim with her. The defendant acknowledged that she had received and been served with an Order from the Superior Court to return the kidnapping victim, but stated that she would not be returning to Santa Clara County and did not need to comply with the Order because she was in Navajo Nation jurisdiction.

7. Further, on October 16, 2020, during a court hearing before the Navajo Nation Courts Judicial District of Crownpoint, New Mexico, I understand that the defendant’s attorney confirmed she was currently living on the Navajo Indian Reservation in New Mexico. In light of

the defendant's statements and her attorney's statements, I believe that the defendant is currently residing in New Mexico with the kidnapping victim.

8. Accordingly, based on the investigation to date and my training and experience, I submit that there is probable cause to believe that the defendant has fled the State of California to New Mexico to avoid arrest and prosecution, and that this purposeful flight constitutes a violation of 18 U.S.C. § 1073.

/S/ Colleen Dettling

Colleen Dettling
Special Agent
Federal Bureau of Investigation

Sworn and subscribed to before me over the telephone pursuant to Fed. R. Crim. P. 4.1 and signed by me on this 30th day of October 2020.



HON. NATHANAEL COUSINS
United States Magistrate Judge

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SANTA CLARA
SOUTH COUNTY COURTHOUSE
COMPLAINT FOR ARREST WARRANT(S)
KAYLIN ALLYSSA COHOE EGB064

Filed

September 23, 2020
Clerk of the Court
Superior Court of CA
County of Santa Clara
F2001696
By: Ilopez

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

FELONY COMPLAINT

vs.

DA NO: 200917655
CEN
EGB064 KAC WARR

KAYLIN ALLYSSA COHOE [REDACTED],
aka KAYLIN COHOE,
1/2 MI E OF ROUTE 9 REDSHEEP NHA #30
BRIMHALL NM 87310

Defendant(s).

The undersigned is informed and believes that:

COUNT 1

On or about August 18, 2020, in the County of Santa Clara, State of California, the crime of KIDNAPPING WITHIN COUNTY OR TO ANOTHER COUNTY, STATE, OR COUNTRY, in violation of PENAL CODE SECTION 207(a), a Felony, was committed by KAYLIN ALLYSSA COHOE who did forcibly, and by any means of instilling fear, steal, take, hold and detain Adalyn Glenda Kirkpatrick in Santa Clara County and carried him/her into another county, state, and country.

COUNT 2

On or about and between August 18, 2020 and September 21, 2020, in the County of Santa Clara, State of California, the crime of DEPRIVING LAWFUL CUSTODIAN OF RIGHT TO CUSTODY OR VISITATION, in violation of PENAL CODE SECTION 278.5(a), a Felony, was committed by KAYLIN ALLYSSA COHOE who did take, entice away, keep, withhold, and conceal a child, Adalyn Glenda Kirkpatrick, of the age of two years, and maliciously deprive, Brodie Edward Kirkpatrick, a lawful custodian, of a right to custody.

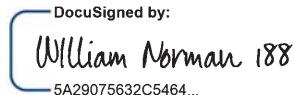
Any defendant, including a juvenile, who is convicted of and pleads guilty and no contest to any felony offense, including any attempt to commit the offense, charged in this complaint or information is required to provide buccal swab samples, right thumbprints and a full palm print impression of each hand, and any blood specimens or other biological samples required pursuant to the DNA and Forensic Identification Database and Data Bank Act of 1998 and Penal Code section 296, et seq.

Further, attached and incorporated by reference are official reports and documents of a law enforcement agency which the complainant believes establish probable cause for the arrest of defendant KAYLIN ALLYSSA COHOE, for the above-listed crimes. Wherefore, A WARRANT OF ARREST IS REQUESTED.

Complainant therefore requests that the defendant(s) be dealt with according to law.

I certify under penalty of perjury that the above is true and correct.

Executed on September 22, 2020, in SANTA CLARA County, California.

DocuSigned by:

 5A29075632C5464...

William Norman 188 217
 (Tolentino 260)
 MHPD (408) 776-7300 20002236 MHPD
 ENGIN/ D501/ FELONY/ AAM

09/30/2020

/S/ Bernal, Paul

Cash or Bond \$ 100,000

Date: _____

Judge of the Superior Court
 JUDGE OF THE SUPERIOR COURT

Warrant Received for Service by:

on _____

ARREST WARRANT

CII:

FBI:

WARRANT CONTROL NO: 2000161605

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SANTA CLARA

THE PEOPLE OF THE STATE OF
CALIFORNIA,

Plaintiff,

vs.

Kaylin Allyssa Cohoe
Kaylin Cohoe
1/2 MI E of Route 9 Redsheep NHA #30
Brimhall, NM 87310

Defendant

DOCKET NO: F2001696

DRIVERS LIC NO: [REDACTED]

AGENCY CASE NO: [REDACTED]

DESCRIPTION

BIRTHDATE: [REDACTED]

HEIGHT: 505

WEIGHT: 136

HAIR: Black

EYES: Brown

SEX: F

RACE: All Others

REMARKS:

SERVICE AGCY: 04310

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY PEACE OFFICER OF SAID STATE:
COMPLAINT UNDER OATH HAVING BEEN MADE BEFORE ME BY:

217

William Norman 188

MORGAN HILL POLICE DEPARTMENT

THAT THE OFFENSE OF:

CHARGES

OF COUNTS ENHANCEMENTS

(F) PC207(a)

1

(F) PC278.5(a)

1

A FELONY HAS BEEN COMMITTED, AND ACCUSING:

Kaylin Allyssa Cohoc

THEREOF, YOU ARE THEREFORE COMMANDED TO ARREST THE ABOVE NAMED DEFENDANT AND
BRING SAID DEFENDANT FORTHWITH BEFORE THE ENTITLED COURT.

☒ THIS WARRANT IS ELIGIBLE FOR NIGHT SERVICE PER SEC 840 PC.

DEFENDANT MAY BE ADMITTED TO BAIL IN THE SUM OF \$

100,000

WITNESS MY HAND AND SEAL,

09/30/2020

/s/ Bernal, Paul

Judge of the Superior Court
of California



THE FOREGOING INSTRUMENT IS
A CORRECT COPY OF THE ORIGINAL
ON FILE IN THIS OFFICE

OCT 22 2020

Clerk of the Court
SUPERIOR COURT OF CA COUNTY OF SANTA CLARA
BY M. Espinosa DEPUTY



Margarita Espinosa

UNITED STATES DISTRICT COURT

for the
Northern District of California

United States of America
v.
KAYLIN ALLYSSA COHOE

Case No. CR 20-71564-MAG

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) KAYLIN ALLYSSA COHOE

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

18 U.S.C. § 1073 - Unlawful Flight to Avoid Prosecution

Date: 10/29/2020



Issuing officer's signature

City and state: San Jose, California

Hon. Nathanael Cousins, U.S. Magistrate Judge

Printed name and title

Return

This warrant was received on (date) 10/30/2020, and the person was arrested on (date) 11/3/2020
at (city and state) _____.

Date: 11/3/2020

Arresting officer's signature

Printed name and title